

DLF | THE DUGGER LAW FIRM PLLC

Cyrus E. Dugger, Esq.
Gotham Center
28-07 Jackson Ave., 5th Fl.
Long Island City, NY 11101
Tel: (646) 560-3208
www.theduggerlawfirm.com

October 19, 2021

Via ECF

The Honorable Gregory H. Woods
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: *Burgess v. Major Model Management, Inc., et al.*, No. 20 Civ. 02816 (GHW)

Dear Judge Woods:

My firm represents Plaintiff Jasmine Burgess, the putative class, and the putative collective in the above-referenced litigation against modeling agency Major Model Management, Inc. (“Major”) and agency owner Guido Dolci (“Dolci”) (collectively, “Defendants”).

Following the Court’s October 15, 2021 certified mailing of its Order responding to Defendant Dolci’s October 13, 2021 email correspondence, Dkt. Nos. 117-18, we write to notify the Court that the service mailing address provided by Mr. Dolci during the October 5, 2021 conference is missing the office suite number.

We draw the Court’s attention to this omission because it is possible that, without a suite number, the Court’s correspondence may not reach Mr. Dolci’s office. The correct office suite number is reflected in the email signature at the bottom of Mr. Dolci’s October 13, 2021 email to the Court that describes him as Major’s “President,” and lists the same address he provided to the Court -- with a suite number of #602 -- *i.e.*, 344 W. 38th Street #602, New York, NY 10018. This is the same address and suite number: (1) currently listed for Defendant Major on its website;¹ and (2) at which Defendant Dolci was served the complaint at his “actual place of business” pursuant to Fed R. Civ. P. 4 (e)(1) and CPLR § 308(4), (6). Dkt. No. 11.

As a courtesy to Defendant Dolci, on October 15, 2021, we forwarded the Court’s October 15, 2021 ECF Order to him at the same email address -- guido@majormodel.com -- from which he emailed the Court on October 13, 2021. Dkt. No. 117.²

¹ <https://www.majormodel.com>.

² We note that this most recently used email address -- guido@majormodel.com -- is different than the email address -- guido.dolci@majormilano.it -- with respect to which Defendants’ counsel

The Court may wish to direct the Clerk of the Court to serve Defendant Dolci at both addresses: (1) 344 W. 38th Street #602 New York, NY 10018; and (2) 344 W. 38th Street, New York, NY 10018 (*i.e.*, both with and without the suite number). Plaintiff will similarly send correspondence filed with the Court via ECF, including this letter, to both addresses.

As a courtesy to Defendant Dolci, we will also email him a copy of this letter at both guido@majormodel.com and guido.dolci@majormilano.it.

Respectfully submitted,

/s/ Cyrus Dugger

cc: (via U.S. mail)

Guido Dolci
Major Model Management, Inc.

requested, and the Court approved, alternative email service on Defendant Dolci in Italy. Dkt. Nos. 107-08, 113. Upon information and belief, Defendant Dolci's: (1) most recently utilized email address of guido@majormodel.com is associated with Defendant Major; and (2) service authorized email address of guido.dolci@majormilano.it is associated with Defendant Dolci's Italian modeling agency Major Milan.